## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: JONATHAN BARGER

Case No. 19-10254-JKF

Debtor

(Chapter 13)

## PRAECIPE TO WITHDRAW OBJECTIONS TO PROOF OF CLAIM OF PENNSYLVANIA DEPARTMENT OF REVENUE (CLAIM NO. 3) AND MOTION FOR A VALUATION PURSUANT TO FED. R. BANKR.P. 3012

Debtor, Jonathan Barger, by and through his attorney, Alan B. Kane, Esquire, hereby withdraws objection to the Proof of Claim filed by the Pennsylvania Department of Revenue (Claim No. 3) as Pennsylvania Department of Revenue has amended its proof of claim to rendered said objection moot.

Respectfully Submitted:

Dated: May 8, 2019

Rv.

Alan B. Kane, Esquire Attorney for Debtor, Jonathan Barger Attorney Id No.: 66379

The Law Office of Alan B. Kane 600 Louis Drive, Suite 201

Warminster, PA 18974 Tele: (610) 279-5151 Fax: (267) 282-5687

E-Mail: akaneesqcpa@msn.com

## CERTIFICATE OF SERVICE

I, Alan B. Kane, Esquire do hereby certify that a copy of the foregoing Praecipe to Withdraw Objections to the Proof of Claim filed by the Pennsylvania Department of Revenue (Claim No. 3) and Motion for Valuation Pursuant to Fed. R. Bankr. P. 3012 has been served on the following by Electronic Mail and/or First Class Mail this 8th day of May, 2019

Carol E. Momjian, Esquire Senior Deputy Attorney General Office of Attorney General The Phoenix Building 1600 Arch Street, Suite 300 Philadelphia, PA 19103 and

Nicole Amolsch
PA Department of Revenue
Bankruptcy Division
P.O. Box 280946
Harrisburg, PA 17128

and

Scott F. Waterman, Esquire Standing Chapter 13 Trustee 2901 St. Lawrence Avenue, Suite 100 Reading, PA 19606

and

Office of the United States Trustee 833 Chestnut Street, Suite 500 Philadelphia, PA 19107

Alan B. Kane, Esquire